

Appl. No. 10/827,232  
Amendment dated: April 18, 2005  
Reply to OA of: November 16, 2004

### **REMARKS**

Applicants have amended the specification, drawings and claims to more particularly define the invention taking into consideration the outstanding Official Action. The specification has been amended to replace the original Abstract with a new Abstract which is found at the end of this paper on a separate sheet as required in the rules.

In addition, the specification has been amended at pages 1-5 to clarify the invention as shown in the figures. These amendments do not introduce new matter into the specification and are in full compliance with the written description requirement of 35 USC 112, first paragraph, as would be appreciated by one of ordinary skill in the art to which the invention pertains. The drawings have been modified at Figures 2, 3, 4 and 5 to more clearly define the portions of conduit 33 as 33(a) and (b) and the corresponding description has been added to the specification. Entry of the amendments are in order and most respectfully requested.

Claims 1-5 have been canceled without prejudice or disclaimer and new claims 6-9 have been added to the application to more clearly define the invention taking into consideration the comments in the Official Action. Applicants most respectfully submit that all the claims now present in the application are in full compliance with 35 U.S.C. §112 and are clearly patentable over the references of record.

The rejection of claims 1-5 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention has been carefully considered but is most respectfully traversed.

Applicants have amended claim 1 as required by the Examiner in the Official Action on page 2 by rewriting this claim as new claim 6. Accordingly, it is most respectfully requested that this rejection be withdrawn.

The rejection of claims 1-4 under 35 U.S.C. §102(b) as being anticipated Koisumi et al. has been carefully considered but is most respectfully traversed in view of the amendment to the claims and the following comments.

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Applicant wishes to direct the Examiner's attention to MPEP § 2131 which states that to anticipate a claim, the reference must teach every element of the claim.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, i.e., identity of terminology is not required. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

The structure of '774 invention is similar to the general interface card because '774 invention comprises a processor circuit board assembly including a connection, an upright slide portion holding the processor circuit board assembly, the processor circuit board assembly is held in an upright position. The difference between the '774 invention and the presently claimed invention is the instant invention comprises the radiator structure including shell body, pump, water tank, fan and cold waterhead, but the '774 invention does not.

The presently claimed invention comprises the pedestal and fixing part but the '847 invention does not. The cold waterhead of the presently claimed invention is apart and not on the shell body, but the structure of '847 invention is located on a plate. Further, the electronic parts of '847 invention are locked on a plate but the electronic parts of the presently claimed invention need to be heat dissipate could be locked on any place with the extension of the cold waterhead.

The heat dissipation device of the '396 invention is air-cool radiator but the instant invention is water-cool radiator module. Further, the way to dissipate heat of the '847 invention is air exchange but the instant invention the heat is taken away by flowing water, all the structures of both inventions are different.

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The heat dissipation device of the '958 invention is air-cool radiator but Applicant's invention is water-cool radiator module. Further, the way to dissipate heat of the '958 invention is air exchange but the instant invention the heat is taken away by flowing water. Further, the most different between the '958 invention and the presently claimed invention is that the air vents of the '958 invention are fixed but the instant invention's are not fixed.

The heat dissipation device of the '077 invention is also an air-cool radiator. The major difference between the '077 invention and the '396, '958 inventions is that the '077 invention comprises a heat transfer plate. The presently claimed invention comprises cold waterhead, pedestal and fixing part but the '077 invention does not.

The presently claimed invention comprises the radiating fins, pedestal and fixing part but the '880 invention does not.

The US 2003/0169566 invention comprises a heat sink structure which is exposed to an ambient, but the presently claimed invention does not. Further, the instant invention comprise the structure of pump, water tank, fan, cold waterhead but the US 2003/0169566 invention does not.

The presently claimed invention comprise fan, pedestal and fixing part but the '824 invention does not.


In conclusion, all above 8 cited inventions are different from the presently claimed invention, though the structure of the '847, '880 and '824 inventions are water-cool radiator but the total structure is different from the presently claimed invention. The structure of the '774 invention is disclosed comprising an interface card which is different from the instant invention. It is the unique structure of the presently claimed invention that the dissipation structures fixed disassemblable on the slot by plug in, and it is the most convenient among all above cited inventions. Accordingly, it is most respectfully requested that this rejection be withdrawn.

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In view of the above comments and further amendments to the claims, favorable reconsideration and allowance of all of the claims now present in the application are most respectfully requested.

Respectfully submitted,

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REF:kdd  
A01.wpd

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**Amendments to the Drawings:**

Please replace the original drawings of Figs. 2, 3, 4 and 5 with the new amended Figs. 2, 3, 4 and 5 which are found at the end of this paper and marked "Replacement Sheet".